

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

CENTENE CORPORATION, et al.,)
Plaintiff(s),)
v.)) **No. 4:24-CV-01415-HEA**
XAVIER BECERRA, et al.,)
Defendant(s).)

JOINT STATUS REPORT

Plaintiff Centene Corporation, along with its affiliated entities Bridgeway Health Solutions of Arizona, Inc., Coordinated Care Corporation, Managed Health Services Insurance Corp., Meridian Health Plan of Michigan, Inc., New York Quality Healthcare Corporation, Wellcare Health Insurance Company of Washington, Inc., Wellcare Health Insurance of the Southwest, Inc., Wellcare Health Plans of Vermont, Inc., Wellcare of Illinois, Inc., and Wellcare of Missouri Health Insurance Company, Inc. (collectively, “Plaintiffs”), and Xavier Becerra, in his official capacity as Secretary of Health and Human Services, U.S. Department of Health and Human Services and Chiquita Brooks-LaSure, in her official capacity as Administrator, Centers for Medicare and Medicaid Services (collectively “Defendants”) by and through their undersigned counsel, hereby submit this Joint Status Report.

1. On December 10, 2024, Plaintiffs filed an Unopposed Motion to Stay, requesting this Court stay the proceedings, including all deadlines in this case, and set a status conference for January 15, 2025, in the event the suit was not voluntarily dismissed by that date.

2. The Court granted Plaintiffs' motion on December 11, 2024. By way of a separate order dated December 11, 2024, the Court ordered the parties to file a status report on or before January 15, 2025.

3. The parties continue to confer and make progress on resolution of certain remaining issues arising from Defendants' erroneous Star rating calculations of Plaintiffs' Medicare Advantage plans and anticipate final resolution in the near future.

4. In light of the parties' ongoing and productive efforts to fully and completely resolve this matter, the parties respectfully request that the Court continue to stay the proceedings and grant both parties relief from deadlines, while the parties continue to work to resolve any remaining issues in this case.

WHEREFORE, the Parties respectfully request that this Court:

- A. Continue to stay the proceedings in this case, including all deadlines; and
- B. Set a status conference on, or require a filing of a joint status report by, February 15, 2025, or other date that is convenient for the Court, in the event that this suit is not voluntarily dismissed in advance of that date.

Dated: January 15, 2025

Respectfully submitted,

By: /s/ Catherine Hanaway
Catherine Hanaway, #41208
Kate Ledden, #66036
Tanner Cook, #71846
HUSCH BLACKWELL LLP
8001 Forsyth Boulevard, Suite 1500
St. Louis, MO 63105
(314) 480-1500
catherine.hanaway@huschblackwell.com
kate.ledden@huschblackwell.com
tanner.cook@huschblackwell.com

Martin J. Bishop (*pro hac vice forthcoming*)
Steven D. Hamilton (*pro hac vice granted*)
REED SMITH LLP
10 South Wacker Drive
40th Floor
Chicago, IL 60606
(312) 207-1000
mbishop@reedsmit.com
shamilton@reedsmit.com

Lesley C. Reynolds (*pro hac vice granted*)
Lara E. Parkin (*pro hac vice forthcoming*)
David A. Bender (*pro hac vice forthcoming*)
REED SMITH LLP
1301 K Street, N.W.
Suite 1000 – East Tower
Washington, D.C. 20005
(202) 414-9200
lreynolds@reedsmit.com
lparkin@reedsmit.com
dbender@reedsmit.com

Counsel for Plaintiffs

By: /s/ Regan Hildebrand

Sayler Fleming
United States Attorney

Regan Hildebrand
Assistant United States Attorney
Thomas F. Eagleton U.S. Courthouse
111 South Tenth Street, 20th Floor
St. Louis, Missouri 63102
(314) 539-7703
Regan.Hildebrand@usdoj.gov
Bar No. 6326374 (IL)
Bar No. 57438 (MO)

Attorneys for Defendants